



**Via Electronic Filing**

**November 1, 2022**

The Honorable Judge Andrew L. Carter, Jr  
U.S. District Court, Southern District of New York  
500 Pearl Street, Room 1920  
New York, NY 10007

***Re.: Toro v. Lauer Enterprises, Inc.***

**Case No: 1:22-cv-08323**

This law firm represents Defendant, Lauer Enterprises, Inc. ("Defendant"), in the above-referenced matter. Defendant was served on October 11, 2022 [Doc 5]. Based on that service, the current deadline for Defendant to respond to the Complaint is November 1, 2022.

The undersigned counsel, files this letter motion on behalf of Defendant, with Plaintiff's consent, respectfully requesting an extension of time for Defendant to answer, move, or otherwise respond to the Complaint to December 1, 2022. Defendant requests the extension of time to respond to the Complaint as Defendant recently retained undersigned counsel and is in the process of intaking and reviewing Defendant's files relevant to the underlying litigation.

This is Defendant's first request for an extension of time to respond to the Complaint.

Plaintiff does not oppose an extension of Defendant's time to respond to the Complaint so that Defendant may adequately respond to the Complaint and the parties may explore potentially resolving this matter. We thank the Court for its attention to this matter.

Respectfully,



Ian E. Smith, Esq.  
Partner, Spire Law, LLC